

REMARKS

Claims 1-36 are pending in the application.

Claims 1-36 have been rejected.

Claims 1, 9, 16, 23 and 30 have been amended.

Unless otherwise specified in the below discussion, Applicants have amended the above-referenced claims in order to provide clarity or to correct informalities in the claims. Applicants further submit that, unless discussed below, these amendments are not intended to narrow the scope of the claims. By these amendments, Applicants do not concede that the cited art is prior to any invention now or previously claimed. Applicants further reserve the right to pursue the original versions of the claims in the future, for example, in a continuing application.

Rejection of Claims Under 35 U.S.C. §103

Claims 1-36 stand rejected under 35 U.S.C. §103(a) as purportedly being unpatentable over U.S. Patent 6,587,126 issued to Wakai et al. (“Wakai”), in view of U.S. Patent No. 6,421,733 issued to Tso et al. (“Tso”). Applicants respectfully traverse these rejections.

In order for a claim to be rendered invalid under 35 U.S.C. §103, the subject matter of the claim as a whole would have to be obvious to a person of ordinary skill in the art at the time the invention was made. *See* 35 U.S.C. §103(a). This requires: (1) the reference(s) must teach or suggest all of the claim limitations; (2) there must be some teaching, suggestion or motivation to combine references either in the references

themselves or in the knowledge of the art; and (3) there must be a reasonable expectation of success. *See* MPEP 2143; MPEP 2143.03; *In re Rouffet*, 149 F.3d 1350, 1355-56 (Fed. Cir. 1998).

As an initial matter, Applicants incorporate previous discussion related to Wakai and Tso to the extent that it continues to apply to claim limitations present in the amended claims. In addition, Applicants present the following discussion related to the amended limitations.

Independent Claims 1, 9, 16, 23 and 30, as amended, each contain, among others, substantially the following amended claim limitations:

receiving a request to provide a requested service, wherein
the request conforms to a request format defined in a first language,
a module performing said receiving is configured to receive the
request from a plurality of source types, and
the plurality of source types comprises an applet executing on a first
remote network node, a control module executing on a second remote
network node, an enterprise application web server executing on a
third remote network node, and a magnetic card reader.

See, e.g., Claim 1 (amended). Applicants submit that support for these amendments can be found throughout the originally-filed Application and at least in paragraphs [0040], [0041], [0043] and [0065]-[0066]. Applicants respectfully submit that neither the cited sections of Wakai nor Tso, alone or in combination, provide disclosure of at least these limitations.

The Office Action cites to Wakai as providing purported disclosure of the “receiving a request to provide a requested service” limitation. *See* Office Action, p.9. The cited section of Wakai relates to Wakai Fig. 2 (elem 202 and 203). Elements 202 and 203 of Wakai Fig. 2 are disclosed to be “web browsers” that communicate with a “web server” 204. *See also* Wakai 13:46-47 (“The client component 102 is constituted by an

operating unit 201 and two Web browsers 202 and 203.”); Wakai 14:41-44 (“The operating instruction data converted by the operating unit 201 are converted into a corresponding request by the Web browser 202, and the request is transmitted to the Web server 204.”). The Office Action further posits that the claimed “module for performing said receiving” corresponds to Wakai’s “web server 204.” *See* Office Action, p.9 (“a module of receiving instructions”).

The cited sections of Wakai only provide for Wakai’s web server to communicate with the web browsers 202 and 203. There is no disclosed capacity or desire for the web server to communicate with any other source type beyond a web browser. *See* Wakai 14:41-55. This is because the cited section of Wakai only contemplates communication between web browsers and a web server. There is no disclosure of a desire to communicate with a control module (as that term is defined by the present Application at least at ¶ [0041]), an enterprise application web server, or a magnetic card reader, as provided in the amended independent claims. Nor is there any disclosure of Wakai’s “web server 204” having a capacity to communicate with the claimed variety of source types. In fact, the disclosure of Wakai related to the cited elements appears to require the direct communication purportedly provided by Wakai’s web browsers with Wakai’s web server. Conversely, the amended claim limitations provide a flexibility unmatched by Wakai’s web server in that the claimed module for receiving is configured to receive requests from the plurality of source types.

The Office Action does not cite Tso as purported disclosure of the “receiving a request” limitation nor does the Office Action provide that Tso enhances Wakai’s web server to communicate with anything other than a web browser and provided in Wakai. Nor does the Office Action suggest that the combination of Wakai with Tso provides any

ability of Wakai's web server to communicate with a plurality of devices, as claimed.

For at least these reasons, and those previously discussed in response to prior Office Actions, Applicants submit that neither Wakai nor Tso, alone or in combination, provides disclosure of all the limitations of Claims 1, 9, 16, 23 and 30, as amended, and all claims depending therefrom, and that these claims are in condition for allowance. Applicants therefore respectfully request the Examiner's reconsideration and withdrawal of the rejections to these claims and an indication of the allowability of same.

CONCLUSION

In view of the amendments and remarks set forth herein, the application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5090.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicant hereby petitions for such extensions. Applicant also hereby authorizes that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to deposit account 502306.

Respectfully submitted,

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